



**Testimony  
Kathryn Dube  
Connecticut Council of Small Towns  
Before the Environment Committee  
March 4, 2016**

The Connecticut Council of Small Towns (COST) respectfully submits testimony in **opposition** to **SB-229 - AN ACT CONCERNING THE ACCURACY AND APPLICABILITY OF CERTAIN ENVIRONMENTAL IMPACT EVALUATIONS, as currently drafted.**

SB-229 may create additional delays in moving forward with critical municipal infrastructure projects by requiring a new Environmental Impact Evaluation (EIE) to be prepared if construction has not begun within five years after the evaluation was conducted.

A new EIE may take months or even years to prepare, allowing opponents to bring critical infrastructure projects to a halt, to the detriment of our communities. Although the number of municipal projects that this may affect is limited, municipalities do undertake complex infrastructure projects which may require approval from a variety of different agencies on the federal, state and local levels. Regulatory approval processes can take months and/or years to complete and approvals for one phase of the project may be required before the project can move to the next phase.

For example, many municipalities are required to upgrade wastewater treatment plants to meet evolving federal EPA standards. These are often comprehensive, multimillion dollar projects that involve lengthy permit negotiations, legal reviews, engineering and other technical reports, and extensive regulatory review and approval processes.

Other communities are moving forward with comprehensive sewer replacement projects, water system upgrades, bridge and road repairs and other infrastructure projects that involve various permitting and funding requirements and timelines. All of these projects require extensive regulatory approvals and may be dependent on certain weather conditions and funding streams to move forward.

While we understand that some circumstances may warrant an additional EIE statement after a period of time, COST is concerned that, as drafted, SB-229 may inadvertently create additional delays in moving forward with critical infrastructure projects even though the project has not changed in scope and the conditions remain the same.

COST urges lawmakers to oppose SB-229, as currently drafted.